

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

PUERTO RICO TOURISM COMPANY,

Plaintiff,

v.

PRICELINE.COM, INCORPORATED,  
TRAVELWEB, LLC, TRIP NETWORK, INC.,  
ORBITZ, LLC, INTERNETWORK  
PUBLISHING CORP. (d/b/a LODGING.COM),  
EXPEDIA, INC. (WA), HOTELS.COM, LP,  
HOTWIRE, INC., EGENCIA, LLC,  
TRAVELOCITY.COM LP, SITE59.COM LLC,  
DOES 1 THROUGH 1000, INCLUSIVE,

Defendants.

**Civil No. 14-cv-01318 (JAF)**

**DEFENDANTS' MOTION TO RESTRICT**

Defendants<sup>1</sup> respectfully move this Court for an Order allowing Defendants to file Exhibit B to their Motion to Strike the Company's Demand for a Jury under the Restricted Filing and Viewing Level of "Parties," as defined in Standing Order No. 9, attached to the parties' Agreed Confidentiality Order. (Dkt. No. 53.)

The exhibit that Defendants seek to file under this designation contains highly sensitive information, including (but not limited to): 1) nonpublic information about Defendants' business models; 2) nonpublic information regarding Defendants' service fees; and 3) confidential and competitively sensitive information regarding Defendants' transaction data. Much of this

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<sup>1</sup> Defendants include priceline.com Incorporated (n/k/a The Priceline Group, Inc.), priceline.com LLC, Travelweb, LLC, Trip Network, Inc. (d/b/a Cheaptickets.com), Orbitz, LLC, Internetnetwork Publishing Corp. (d/b/a Lodging.com), Expedia, Inc. (WA), Hotels.com, LP, Hotwire, Inc., Egencia, LLC, Travelocity.com LP (n/k/a TVL LP), and Site59.com, LLC.

information is so sensitive that it cannot even be viewed by the other Defendants (although it may be viewed subject to the protective order by outside counsel). Moreover, in litigation pertaining to Defendants' liability for hotel occupancy taxes that is pending in other jurisdictions, exhibits that contain similar or identical information—primarily pertaining to Defendants' business models—have been filed under seal. Accordingly, Defendants wish to maintain the confidentiality of this business information.

WHEREFORE, Defendants respectfully request that the Court grant their Motion to Restrict.

Respectfully submitted.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification electronically to all counsel of record.

In San Juan, Puerto Rico, the 7th day of August, 2015.

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